



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PRETREATMENT PERMIT

issued to

Metal Management Aerospace, Inc.
500 Flatbush Avenue
P.O. Box 119
Hartford, CT 06141-0119

Facility ID: 064-096 Permit ID: SP0000050

Permit Expires: January 16, 2006

SECTION 1: GENERAL PROVISIONS

- (A) This permit is reissued in accordance with section 22a-430 of Chapter 446k, Connecticut General Statutes ("CGS"), and Regulations of Connecticut State Agencies ("RCSA") adopted thereunder, as amended, and a modified Memorandum of Agreement (MOA) dated June 3, 1981, by the Administrator of the United States Environmental Protection Agency which authorizes the State of Connecticut to administer a Pretreatment Program pursuant to 40 CFR Part 403.
- (B) Metal Management Aerospace, Inc., ("Permittee"), shall comply with all conditions of this permit including the following sections of the RCSA which have been adopted pursuant to section 22a-430 of the CGS and are hereby incorporated into this permit. Your attention is especially drawn to the notification requirements of subsection (i)(2), (i)(3), (j)(1), (j)(6), (j)(8), (j)(9)(C), (j)(11)(C), (D), (E), and (F), (k)(3) and (4) and (l)(2) of section 22a-430-3.

section 22a-430-3 General Conditions

- (a) Definitions
- (b) General
- (c) Inspection and Entry
- (d) Effect of a Permit
- (e) Duty
- (f) Proper Operation and Maintenance
- (g) Sludge Disposal
- (h) Duty to Mitigate
- (i) Facility Modifications; Notification
- (j) Monitoring, Records and Reporting Requirements
- (k) Bypass
- (l) Conditions Applicable to POTWs
- (m) Effluent Limitation Violations (Upsets)
- (n) Enforcement
- (o) Resource Conservation
- (p) Spill Prevention and Control
- (q) Instrumentation, Alarms, Flow Recorders
- (r) Equalization

<input checked="" type="checkbox"/>	PAMS
<input checked="" type="checkbox"/>	PET
<input checked="" type="checkbox"/>	CPOCS
<input checked="" type="checkbox"/>	PERMIT

section 22a-430-4 Procedures and Criteria

- (a)Duty to Apply
- (b)Duty to Reapply
- (c)Application Requirements
- (d)Preliminary Review
- (e)Tentative Determination
- (f)Draft Permits, Fact Sheets
- (g)Public Notice, Notice of Hearing
- (h)Public Comments
- (i)Final Determination
- (j)Public Hearings
- (k)Submission of Plans and Specifications. Approval.
- (l)Establishing Effluent Limitations and Conditions
- (m)Case by Case Determinations
- (n)Permit issuance or renewal
- (o)Permit Transfer
- (p)Permit revocation, denial or modification
- (q)Variances
- (r)Secondary Treatment Requirements
- (s)Treatment Requirements for Metals and Cyanide
- (t)Discharges to POTWs - Prohibitions

- (C) Violations of any of the terms, conditions, or limitations contained in this permit may subject the permittee to enforcement action, including but not limited to, seeking penalties, injunctions and/or forfeitures pursuant to applicable sections of the CGS and RCSA.
- (D) Any false statement in any information submitted pursuant to this permit may be punishable as a criminal offense under section 22a-438 or 22a-131a of the CGS or in accordance with section 22a-6, under section 53a-157b of the CGS.
- (E) The authorization to discharge under this permit may not be transferred without prior written approval of the Commissioner. To request such approval, the permittee and proposed transferee shall register such proposed transfer with the Commissioner at least 30 days prior to the transferee becoming legally responsible for creating or maintaining any discharge which is the subject of the permit transfer. Failure by the transferee to obtain the Commissioner's approval prior to commencing such discharge(s) may subject the transferee to enforcement action for discharging without a permit pursuant to applicable sections of the CGS and RCSA.
- (F) Nothing in this permit shall relieve the permittee of other obligations under applicable federal, state and local law.
- (G) An annual fee shall be paid for each year this permit is in effect as set forth in section 22a-430-7 of the Regulations of Connecticut State Agencies.

SECTION 2: DEFINITIONS

- (A) The definitions of the terms used in this permit shall be the same as the definitions contained in section 22a-423 of the CGS and section 22a-430-3(a) and 22a-430-6 of the RCSA.
- (B) In addition to the above the following definitions shall apply to this permit:

"----" in the limits column on the monitoring table means a limit is not specified but a value must be reported on the DMR.

"Annual" in the context of a sampling frequency, means the sample must be collected in the month of January.

"Average Monthly Limit" means the maximum allowable "Average Monthly Concentration" as defined in section 22a-430-3(a) of the RCSA when expressed as a concentration (e.g. mg/l); otherwise, it means "Average Monthly Discharge Limitation" as defined in section 22a-430-3(a) of the RCSA.

"Daily Concentration" means the concentration of a substance as measured in a daily composite sample, or the arithmetic average of all grab sample results defining a grab sample average.

"Daily Quantity" means the quantity of waste discharged during an operating day.

"Instantaneous Limit" means the highest allowable concentration of a substance as measured by a grab sample, or the highest allowable measurement of a parameter as obtained through instantaneous monitoring.

"Maximum Daily Limit" means the maximum allowable "Daily Concentration" (defined above) when expressed as a concentration (e.g. mg/l); otherwise, it means the maximum allowable "Daily Quantity" as defined above unless it is expressed as a flow quantity. If expressed as a flow quantity it means "Maximum Daily Flow" as defined in section 22a-430-3(a) of the RCSA.

"NA" as a Monitoring Table abbreviation means "not applicable".

"NR" as a Monitoring Table abbreviation means "not required".

"Quarterly", in the context of a sampling frequency, means sampling is required in the months of January, April, July and October.

"Range During Sampling" or "RDS", as a sample type, means the maximum and minimum of all values recorded as a result of analyzing each grab sample of; 1) a Composite Sample, or 2) a Grab Sample Average. For those permittees with continuous monitoring and recording pH meters, Range During Sampling shall mean the maximum and minimum readings recorded with the continuous monitoring device during the Composite or Grab Sample Average sample collection.

"Range During Month" or "RDM", as a sample type, means the lowest and the highest values of all of the monitoring data for the reporting month.

"Semi-Annual" in the context of a sampling frequency, means the sample must be collected in the months of January and July.

"Twice per Month" when used as a sample frequency shall mean two samples per calendar month collected no less than 12 days apart.

"ug/l" means micrograms per liter.

SECTION 3: COMMISSIONER'S DECISION

- (A) The Commissioner of Environmental Protection ("the Commissioner") has made a final determination and found that the continuance of the existing system to treat the discharge will protect the waters of the state from pollution. The Commissioner's decision is based on application #199802551 for permit reissuance received on May 7, 1998 and the administrative record established in the processing of that application.
- (B) The Commissioner hereby authorizes the Permittee to discharge in accordance with the provisions of this permit, the above referenced application, and all approvals issued by the Commissioner or his authorized agent for the discharges and/or activities authorized by, or associated with, this permit.
- (C) The Commissioner reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions which may be authorized under the Federal Clean Water Act or the Connecticut General Statutes or regulations adopted thereunder, as amended. The permit as modified or renewed under this paragraph may also contain any other requirements of the Federal Clean Water Act or Connecticut General Statutes or regulations adopted thereunder which are then applicable.

SECTION 4: EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- (A) The discharges shall not exceed and shall otherwise conform to specific terms and conditions listed below. The discharges are restricted by, and shall be monitored in accordance with, the tables below.

Table A

Discharge Serial Number: 001-1

Monitoring Location: 1

Wastewater Description: Metal Cleaning Wastewater - Combined discharge from chip washer and UF system

Monitoring Location Description: Flow meter is located on 4" discharge pipe from the sand filtration system. Wastewater samples are taken from this pipe using an automatic sampler.

Discharge is to: The MDC Water Pollution Control Facility located in the City of Hartford

PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			Minimum Level Test
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency 2	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample/Reporting Frequency	Sample Type or measurement to be reported	
Flow, Average and Maximum 1	Gpd	113,000	144,000	Continuous	Daily Flow	NA	NR	NA	
Flow, Total	Gpd	NA	144,000	Monthly	Daily Flow	NA	NR	NA	
PH	S.U.	NA	NA	NR	NA	6.0 – 12.0	Monthly	RDS	
pH, Continuous	S.U.	NA	NA	NR	NA	6.0 – 12.0	Continuous	RDM	
Aluminum, Total	mg/l	NA	----	Monthly	Daily Composite	NA	NR	NA	
Chromium, Total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	NA	
Copper, Total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	NA	
Iron, Total	mg/l	NA	----	Monthly	Daily Composite	NA	NR	NA	
Lead, Total	mg/l	0.1	0.5	Monthly	Daily Composite	0.75	NR	NA	
Nickel, Total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	NA	
Oil & Grease, Total	mg/l	NA	----	Monthly	Grab Sample Average	NA	NR	NA	
Oil & Grease, Hydrocarbon Fraction	mg/l	NA	100	Monthly	Grab Sample Average	100	NR	NA	
Total Polychlorinated Biphenyl's (PCB's)	ug/l	NA	NA	NR	NA	----	Quarterly	Grab	*
Zinc, Total	mg/l	1.0	2.0	Monthly	Daily Composite	3.0	NR	NA	

Table Footnotes:

Table Footnotes:

- 1 For this parameter the permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily Flow for each month.
- 2 The first entry in this column is the 'Sample Frequency'. If this entry is not followed by a 'Reporting Frequency' and the 'Sample Frequency' is more frequent than monthly then the 'Reporting Frequency' is monthly. If the 'Sample frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.
- 3 Minimum Level Test refers to Section 5 Paragraph (F) of this permit.

PERMIT # SP0000050

Table B										
Discharge Serial Number: 001B					Monitoring Location: 1					
Wastewater Description: Treated Oily Wastewater from Ultra Filtration System										
Monitoring Location Description: 150 gallon permeate tank via an automatic sampler										
Discharge is to: DSN 001-1 then to the MDC Water Pollution Control Facility located in the City of Hartford										
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING				Minimum Level Test3
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency 2	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample/Reporting Frequency	Sample Type or measurement to be reported		
Flow, Average and Maximum 1	Gpd	13,000	19,000	Continuous	Daily Flow	NA	NR	NA		
Flow, Total	Gpd	NA	19,000	Quarterly	Daily Flow	NA	NR	NA		
pH	S.U.	NA	NA	NR	NA	6.0 – 11.5	Quarterly	RDS		
Oil & Grease, Total	mg/l	NA	----	Quarterly	Grab Sample Average	NA	NR	NA		
Oil & Grease, Hydrocarbon Fraction	mg/l	33.0	66.0	Quarterly	Grab Sample Average	99.0	NR	NA		
Total Polychlorinated Biphenyl's (PCB's)	ug/l	NA	NA	NR	NA	----	Quarterly	Grab	*	
Table Footnotes:										

Table Footnotes:

- 1 For this parameter the permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report the Average Daily Flow and the Maximum Daily Flow for each month
- 2 The first entry in this column is the 'Sample Frequency'. If this entry is not followed by a 'Reporting Frequency' and the 'Sample Frequency' is more frequent than monthly then the 'Reporting Frequency' is monthly. If the 'Sample frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'
- 3 Minimum Level Test refers to Section 5 Paragraph (F) of this permit.

Table C

Discharge Serial Number: 001C
 Monitoring Location: 1
 Wastewater Description: Groundwater Remediation
 Monitoring Location Description: Underground concrete vault holding tank. Discharge to UF System, following PCB pretreatment by gravity separation
 Discharge is to: The MDC Water Pollution Control Facility located in the City of Hartford

PARAMETER	UNITS	FLOW/TIME/BASED MONITORING				INSTANTANEOUS MONITORING			Minimum Level Test
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency 2	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample// Reporting Frequency	Sample Type or measurement to be reported	
Total Polychlorinated Biphenyl's (PCB's)	ug/l	NA	NA	NIR	NA	----	Quarterly	Grab	*
Flow, Total	Gpd	NA	----	Quarterly	Daily Flow	NA	NR	NA	

Table Footnotes:

Footnotes:

1 For this parameter the permittee record and report the total flow on the day of sample collection.

2 The first entry in this column is the 'Sample Frequency'. If this entry is not followed by a 'Reporting Frequency' and the 'Sample Frequency' is more frequent than monthly then the 'Reporting Frequency' is monthly. If the 'Sample frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'.

3 Minimum Level Test refers to Section 5 Paragraph (F) of this permit.

Table D

Discharge Serial Number: 003		Monitoring Location: 1							
Wastewater Description: Laboratory Wastewater									
Monitoring Location Description: Samples are taken from the standpipe connected to the sanitary sewer within the Laboratory									
Discharge is to: The MDC Water Pollution Control Facility located in the City of Hartford									
PARAMETER	UNITS	FLOW/TIME BASED MONITORING				INSTANTANEOUS MONITORING			Minimum Level Test
		Average Monthly Limit	Maximum Daily Limit	Sample/Reporting Frequency	Sample Type or Measurement to be reported	Instantaneous limit or required range	Sample/Reporting Frequency ¹	Sample Type or measurement to be reported	
Flow, Average and Maximum	Gpd	1,000	2,000	NR	NA	NA	NR	NA	
pH	S.U.	NA	NA	NR	NA	6.0 – 9.0	Monthly	Grab	
Table Footnotes:									
1. The first entry in this column is the 'Sample Frequency' and the 'Sample Frequency' is more frequent than monthly then the 'Reporting Frequency' is monthly. If the 'Sample frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'									

Table Footnotes:

¹ The first entry in this column is the 'Sample Frequency'. If this entry is not followed by a 'Reporting Frequency' and the 'Sample Frequency' is more frequent than monthly then the 'Reporting Frequency' is monthly. If the 'Sample frequency' is specified as monthly, or less frequent, then the 'Reporting Frequency' is the same as the 'Sample Frequency'

- (B) All samples shall be comprised of only those wastewaters described in this schedule, therefore, samples shall be taken prior to combination with wastewaters of any other type and after all approved treatment units, if applicable. All samples taken shall be representative of the discharge during standard operating conditions.
- (C) In cases where limits and sample type are specified but sampling is not required, the limits specified shall apply to all samples which may be collected and analyzed by, the Department of Environmental Protection personnel, the permittee, or other parties.
- (D) The limits imposed on the discharges listed in this permit take effect on the issuance date of this permit, hence any sample taken after this date which, upon analysis, shows an exceedance of permit limits will be considered non-compliance.

The monitoring requirements of this permit begin on the date of issuance of this permit if the issuance date is on or before the 12th day of a month. For permits issued on or after the 13th day of a month, monitoring requirements begin the 1st day of the following month.

SECTION 5: SAMPLE COLLECTION, HANDLING and ANALYTICAL TECHNIQUES AND REPORTING REQUIREMENTS

- (A) Chemical analyses to determine compliance with effluent limits and conditions established in this permit shall employ methods approved by the Environmental Protection Agency pursuant to 40 CFR 136 unless an alternative method has been approved in writing in accordance with 40CFR 136.4.
- (B) All metals analyses identified in this permit shall refer to analyses for Total Recoverable Metal as defined in 40CFR136 unless otherwise specified.
- (C) The results of chemical analysis required above shall be entered on the Discharge Monitoring Report (DMR), provided by this office, and reported to the Bureau of Water Management at the following address. The report shall also include a detailed explanation of any violations of the limitations specified. The DMR shall be received at this address by the last day of the month following the month in which samples are taken.

Bureau of Water Management (Attn: DMR Processing)
Connecticut Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

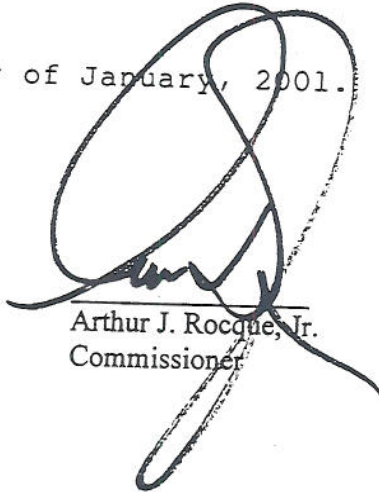
- (D) If this permit requires monitoring of a discharge on a calendar basis (e.g. Monthly, quarterly, etc.) but a discharge has not occurred within the frequency of sampling specified in the permit, the Permittee must submit the DMR as scheduled, indicating "NO DISCHARGE". For those permittees whose required monitoring is discharge dependent (e.g. per batch), the minimum reporting frequency is monthly. Therefore, if there is no discharge during a calendar month for a batch discharge, a DMR must be submitted indicating such by the end of the following month.
- (E) Copies of all DMRs shall be submitted concurrently to the local Water Pollution Control Authority(ies) ("WPCA") involved in the treatment and collection of the permitted discharge.

- (F) The analytical method used to determine the concentration of polychlorinated biphenyls (PCBs) shall be EPA Method 608. The minimum level of detection shall be 1.0 ug/l

SECTION 6: RECORDING AND REPORTING OF VIOLATIONS, ADDITIONAL TESTING REQUIREMENTS

- (A) If any sample analysis indicates that an effluent limitation specified in Section 4 of this permit has been exceeded, a second sample of the effluent shall be collected and analyzed for the parameter(s) in question and the results reported to the Bureau of Water Management (Attn: DMR Processing) within 30 days of the exceedance.
- (B) The Permittee shall immediately notify the Bureau of Water Management (Attn: Permits, Enforcement and Remediation Division) and the local WPCA of all discharges that could cause problems to the Publicly Owned Treatment Works ("POTW"), including but not limited to slug loadings of pollutants which may cause a violation of the POTW's NPDES permit, or which may inhibit or disrupt the POTW, its treatment processes or operations, or its sludge processes, use or disposal.
- (C) In addition to the notification requirements specified in Section 1B of this permit, if any sampling and analysis of the discharge performed by the permittee indicates a violation of limits specified in Section 4 of this permit, the permittee shall notify the Bureau of Water Management (Attn: Permits, Enforcement and Remediation Division) within 24 hours of becoming aware of the violation.

This permit is hereby issued on the 16th day of January, 2001.



Arthur J. Rocque, Jr.
Commissioner

cc: Hartford MDC POTW

DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Metal Management Aerospace, Inc.

PAMS Company ID: 109936

PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: SP0000050

APPLICATION #: 199802551

FACILITY ID. 064-096

<u>Mailing Address:</u> Street: 500 Flatbush Ave. City: Hartford ST: CT Zip: 06106 Contact Name: Dan Mullen Phone No.: (860) 522-3123 ext. 7253	<u>Location Address: SAME</u> Street: City: ST CT Zip: Contact Name: Phone No.:
---	---

PERMIT INFORMATION

DURATION 5 YEAR ☒

10 YEAR ☐

30 YEAR ☐

TYPE New ☐

Reissuance ☒

Modification ☐

CATEGORIZATION POINT (x)

NON-POINT ()

GIS # ☐

NPDES ()

PRETREAT (x)

GROUND WATER(UIC) ()

GROUND WATER (OTHER) ()

NPDES MAJOR(MA) ☐

NPDES SIGNIFICANT MINOR or PRETREAT SIU (SI) ☒

NPDES or PRETREATMENT MINOR (MI) ☐

PRETREAT SIGNIFICANT INDUS USER(SIU) ☒

PRETREAT CATEGORICAL (CIU) ☐

Note: If it's a CIU then check off SIU

POLLUTION PREVENTION MANDATE ☐

ENVIRONMENTAL EQUITY ISSUE ☐

COMPLIANCE SCHEDULE YES ☐

NO ☒

POLLUTION PREVENTION ☐
CONSERVATION ☐

TREATMENT REQUIREMENT ☐ WATER

WATER QUALITY REQUIREMENT ☐ REMEDIATION ☐ OTHER ☐

OWNERSHIP CODE

Private ☒ Federal ☐ State ☐

Municipal (town only) ☐

Other public ☐

PERMIT # SP0000050

DEP STAFF ENGINEER David Cherico

PERMIT FEES

Discharge Code	DSN Number	Annual Fee
518000c	001-1	5,450
518000N	001-B	0
5090000	001-C	2,725
501032x	003-1	350

FOR SEWER DISCHARGES

Discharge to the MDC in Hartford via its collection system. The facility ID. of the POTW is 064-001.

NATURE OF BUSINESS GENERATING DISCHARGE

Scrap metal recycling. Operations include washing and cleaning, cutting, separation, crushing, shredding, sorting and packaging scrap metal products for recycling.

PROCESS AND TREATMENT DESCRIPTION (by DSN)

DSN 001-1: Alkaline cleaning and rinsing of metal chips followed by equalization and sand filtration.
DSN 001B: Oily wastewater pretreated by ultrafiltration., and discharged to DSN 001-1.

RESOURCES USED TO DRAFT PERMIT

x Department File Information

BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS

x *Best Professional Judgement (See Other Comments)*

DSN 001-1: Chromium, copper, lead, nickel, zinc, oil & grease

DSN 001B: Oil & grease

COMMENTS

The limits in this permit were carried over from the previous permit, with the exception of copper. A copper limit was added based on its expected presence. In addition PCB monitoring was added in this permit as it was learned that a PCB groundwater remediation system discharges to the wastewater treatment system covered by this permit. The permit contains higher than normal upper pH limits for DSN s 001 and 001B, also carried over from the previous permit. This was done to preclude the need for pH reduction (acid addition) and because the MDC sewer authority specifically requested (in writing) these higher limits (up to 12.0 s.u.) since it benefited the POTW's treatment process.